

**IN THE UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF MISSOURI
WESTERN DIVISION**

UNITED STATES OF AMERICA,

Plaintiff,

v.

KAREN A. OLSON,

Defendant.

Case No. 11-00223-11-CR-W-BCW

GOVERNMENT’S MOTION FOR DOWNWARD DEPARTURE

Comes now the United States of America, by and through its undersigned counsel, and files its motion for downward departure pursuant to Title 18, United States Code, Section 3553(e), Title 28, United States Code, Section 994(n), and United States Sentencing Guidelines, Section 5K1.1, as a result of the substantial assistance provided to the government by the defendant, Karen A. Olson. As such, this Court is authorized to impose a sentence below the applicable guideline range as well as the statutorily required minimum sentence. In support of this motion, the government states:

1. The defendant, Karen A. Olson, fully and completely cooperated with law enforcement officials during the course of this and in the course of a separate tax fraud investigation.
2. The defendant was debriefed and fully revealed her knowledge of and involvement in a variety of fraudulent activity and revealed information concerning Gerald Poynter’s tax fraud scheme. Her testimony was deemed to be truthful and cooperative.

3. Karen A. Olson has identified multiple individuals who were involved in Gerald Poynter's tax fraud scheme. Following her cooperation, co-defendant Jeffrey Olson pleaded guilty. Second, she provided cooperation and testimony concerning a separate OID tax fraud case in Brooklyn, New York. This involved travel to New York in July 2014 and her providing testimony in a formal proceeding.

4. Moreover, Karen A. Olson remained and remains available and willing to testify in any case or proceeding as needed.

5. Accordingly, the government states the defendant has provided substantial assistance as that term is used in the applicable statutes and guideline sections and as such, believes that a downward departure is appropriate in this matter. The United States encourages this Court to impose a sentence of probation.

WHEREFORE, for the foregoing reasons, the government requests that the Court exercise its discretion and depart below the applicable guideline range.

Respectfully Submitted,

Tammy Dickinson
United States Attorney

By */s/ Daniel M. Nelson*

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing was delivered on September 16, 2014, to the CM-ECF system of the United States District Court for the Western District of Missouri for electronic delivery to all counsel of record.

/s/ Daniel M. Nelson

Daniel M. Nelson

Assistant United States Attorney